

**EXHIBIT 4**

20 have done.

21 Q. When you say request for this information,  
22 what was Ms. Johnson requesting you to do?

23 A. I'm not sure. I'm not sure if it was a  
24 request.

25 Q. Did you do anything with the information  
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1 contained in the Excel spreadsheet that Ms. Johnson  
2 sent to you?

3 A. Not that I can recall.

4 MS. JAYARAMAN: Okay. Cathy, can you  
5 introduce Tab 31, please.

6 MR. RUSSO: Hey, counsel, what do you want  
7 to do about lunch? I mean, how much more time do  
8 you have? It doesn't sound like -- I don't know,  
9 are you near being done? If not --

10 MS. JAYARAMAN: Yeah, so I just want to  
11 finish this line of questioning and then I think we  
12 can take a lunch break if that's all right.

13 MR. RUSSO: How much longer in this line?

14 MS. JAYARAMAN: You know what? We can  
15 take a lunch break now if that sounds good. So we  
16 can go off the record.

17 MS. REYES: Actually, before we go off the  
18 record -- I'm sorry. Can we go back on the record

19 really quickly. Hi. Sorry. I got kicked off for a  
20 second. I wanted to address Mr. Russo. I sent you  
21 an email regarding a prior order from judge brown  
22 from the Texas redistricting case. I believe it's  
23 an August order. You should have received that in  
24 your mail a few minutes ago and I wanted to ask  
25 based on your reading of that order, are you still  
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1 asserting privilege with regards to questions about  
2 Dale Oldham?

3 MR. RUSSO: Yes. Based upon my reading  
4 that while defending the deposition, I don't think  
5 that that order provides you access to  
6 attorney-client information, you know. So right now  
7 we're maintaining that the objection -- we'll review  
8 it and if you're -- you know, if we come to a  
9 different conclusion, we'll have a discussion about  
10 that. But again, what you sent us is discussing a  
11 work product privilege and the attorney-client  
12 portion deals with documents and generic objection  
13 made to production of documents. That's not what  
14 we're dealing with here. We're dealing with  
15 specific communications between a client and a  
16 lawyer.

17 MS. REYES: Okay. Well, I will give you  
18 time to review it like I say over the lunch break as  
19 you said you needed to do and we can readdress it.  
20 Thank you.

21 MR. RUSSO: Fair enough.

22 ZOOM TECH: Okay. If there's nothing  
23 else, then we'll go off the record.

24 (Recess from 12:26 to 1:13)

25 BY MS. JAYARAMAN:  
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1 Q. Mr. Sigler, let's take a look at Sigler  
2 Exhibit 8, please. And just let me know when you  
3 have it up in front of you, please?

4 A. I have it in front of me.

5 Q. Great. So I'm showing you what has been  
6 marked as Sigler Exhibit 8, which is Bates stamped  
7 DEFS00011706 through DFFS00011709. It's an email  
8 from Ms. Johnson to you -- sorry, Ms. Johnson to a  
9 number of recipients on which you are copied dated  
10 November 19th, 2021. Would you agree?

11 A. Yes.

12 Q. So the people in the to line are Kristi  
13 Saludis who we talked about earlier, then someone  
14 named Stephanie berry. Who is Stephanie berry?

15 A. I do not know.